



### PERKINS COIE LLP

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March 24, 1999

#### Via Hand Delivery

Thomas J. Andersen, Esq. Office of the General Counsel Federal Election Commission 999 E Street, NW - 6th Floor Washington, DC 20463

Re: MUR 4763

Dear Mr. Andersen:

Enclosed please find the Response of the Jefferson County Democratic Party to the Federal Election Commission's Subpoena to Produce Documents and Order to Submit Written Answers.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Marc E. Elias

Counsel to Respondents

Mary E. Ehas/dl

Enclosure

[04031-0058/DA990820.039]

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	OLL ICE BAR
MUR 4763	)	T WE SELECTION OF
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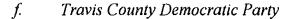
# JEFFERSON COUNTY DEMOCRATIC PARTY'S RESPONSE TO THE FEDERAL ELECTION COMMISSION'S SUBPOENA TO PRODUCE DOCUMENTS AND ORDER TO SUBMIT WRITTEN ANSWERS

1. Produce all documents, including changed or superseded versions, related to the creation, organization, and operation of the Jefferson County Democratic Party, including but not limited to the constitution, charter, bylaws, rules, regulations, resolutions, agreements, contracts, procedural manuals, memoranda of understanding or any comparable governing documents.

The Jefferson County Democratic Party ("JEF") has not located any documents responsive to this Request.

- 2. State the relationship between the Jefferson County Democratic Party and each of the following (Texas) committees, including whether the committees have ever been financed, maintained or controlled in any manner by the Jefferson County Democratic Party, or vice versa. Describe fully such financial support, maintenance or control.
  - a. Texas Democratic Party
  - b. Bexar County Democratic Party
  - c. Dallas County Democratic Party
  - d. Galveston County Democratic Party
  - e. Harris County Democratic Party



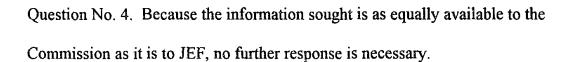


- g. 21st Century Political Action Committee (name of record for the Tarrant County Democratic Party-Federal Account)
- h. Nueces County Democratic Party
- i. El Paso County Democratic Party
- j. Hays County Democratic Party Executive Committee
- k. Potter-Randall County Democratic Club

JEF objects this Interrogatory on the grounds that the term "relationship is vague and ambiguous." JEF denies that it has ever "financed, maintained or controlled" any of the County Democratic Parties listed, or the Texas Democratic Party. Similarly, JEF denies that it has ever been "financed, maintained or controlled" by any of the County Democratic Parties listed or the Texas Democratic Party. It is a matter of public record that JEF and the Texas Democratic Party occasionally received and/or sent money to one another. The relationship between JEF and the other parties is their common commitment to the Democratic Party, its ideas, principles, and candidates.

3. Provide the date, amount and purpose of each and every transfer (including all direct and in-kind contributions) between the Jefferson County Democratic Party and each of the committees listed in Question 2.

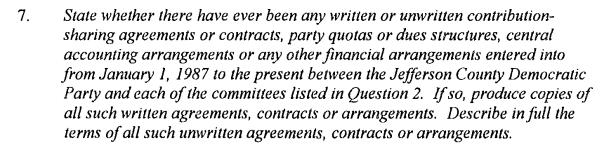
The information sought by this Interrogatory is contained in reports filed with the Federal Election Commission, as well as in documents produced in response to



- 4. Identify and produce copies of all documents, including deposit slips and negotiated checks (front and back if applicable), representing, reflecting, referring to or relating to each and every transfer (including all direct and inkind contributions) between the Jefferson County Democratic Party and each of the committees listed in Ouestion 2.
- Documents responsive to this Request are attached as Bates numbers
   JEF0001 through JEF0002.
- 5. If not produced in response to Question 4, identify and produce all documents that formed the basis for determining the timing and amounts of each and every transfer (including direct and in-kind contributions) between the Jefferson County Democratic Party and each of the committees listed in Question 2.
- 5. JEF objects to this Request on the grounds that the phrase "formed the basis for determining the timing of each and every transfer" is vague and ambiguous.

  Documents responsive to this request are attached as Bates numbers JEF0001 through JEF0002.
- 6. State whether there have ever been any written or unwritten policies or guidelines formulated between January 1, 1987 and the present concerning the transfers of funds (including direct and in-kind contributions) between the Jefferson County Democratic Party and each of the committees listed in Question 2. If so, produce copies of all such written policies. Describe in full the terms of all such unwritten policies.

JEF is unaware of any such written or unwritten policies or guidelines other than FEC regulations.



JEF is unaware of any such agreements.

8. State whether any contributions by the Jefferson County Democratic Party in connection with federal elections have ever been made in cooperation, consultation or concert with, or at the request or suggestion of any of the party committees listed in Question 2. If yes, state the year(s) and candidate(s) supported.

JEF is unaware of any contributions as described in this Interrogatory.

9. State whether the Texas Democratic Party has ever requested or suggested to Jefferson County Democratic Party that it make specific contributions to any federal candidates or has ever consulted or worked in concert with Jefferson County Democratic Party in their making of any such contributions. If yes, state the year(s) and candidate(s) supported.

JEF is unaware of any contributions as described in this Interrogatory.

10. State whether the Jefferson County Democratic Party has ever requested or suggested to any of the committees listed in Question 2 that they make specific contributions to any federal candidates or has ever been consulted or worked in concert with any of listed committees in their making of any such contributions. If yes, state the year(s) and candidate(s) supported.

JEF is unaware of any contributions as described in this Interrogatory.



Identify all individuals who hold or have held positions, whether paid or unpaid, with the Jefferson County Democratic Party, and who hold or have also held positions, whether paid or unpaid, with any of the committees listed in Question 2.

JEF has not identified any such persons.

12. State whether the Texas Democratic Party has the authority or ability to hire, appoint, demote, remove or otherwise control the officers, or other decision-making employees, or members of Jefferson County Democratic Party.

The Texas Democratic Party has no such authority or ability.

I declare under penalty of perjury that the foregoing is true and correct. Dated

this day of March, 1999.

Gybert Adams

## TEXAS DEMOCRATIC PARTY-FEDERAL

MOTTURE BANKS

Norwest Bank Texas, South Central P.O. Box 2019 Austin, Tx 78768-2019

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(MULTICANDIDATE, FEC C00099267) 919 CONGRESS, SUITE 600 512-478-9800 AUSTIN, TX 78701

Seven Hundred Sixty-Nine and 50/100----

DATE

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**AMOUNT** 

TO THE ORDER Jefferson County Democratic Party-Federal

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TEXAS DEMOCRATIC PARTY-FEDERAL AUSTIN, TX 78701

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT. PLEASE NOTIFY US PROMPTLY, NO RECEIPT DESIRED

Birthday Distribution

DEPOSIT SLIP Currency Coin FSR # Checks FPOSIT GFB-2000 (Rev Total Tran. Code Less Cash Costomer Signature (less cash) Net Deposit Check Hold: 2 days \$ 5 days S Checks and other items are received for deposit subject to the provisions of the uniform commercial code or any applicable collection agreement.

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